

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION**

Carroll Independent School District,

Plaintiff,

v.

**United States Department of Education,
et al.,**

Defendants.

Case No. 4:24-cv-00461-O

**PARTIES' JOINT NOTICE OUTLINING SCHEDULE FOR
EXPEDITED RESOLUTION**

Pursuant to the Court's Order of July 31, 2024 (ECF No. 55), the parties respectfully submit the following joint notice outlining the agreed schedule for expedited resolution of this matter:

1. Plaintiff will file its motion for summary judgment and memorandum in support by August 16, 2024.
2. Defendants will produce the partial administrative record they intend to produce in *Tennessee v. Cardona*, 2:24-cv-72 (E.D. Ky.) in this case on August 16, 2024. Defendants may supplement that production with additional portions of the administrative record relevant to this case by August 23, 2024.
3. Defendants will file their combined motion for summary judgment, memorandum in support, and response to Plaintiff's motion for summary judgment on September 6, 2024.
4. Plaintiff will file its combined response to Defendants' motion for summary judgment and reply in support of its motion for summary judgment by September 16, 2024.

5. Defendants will file their reply in support of their motion for summary judgment by September 26, 2024.

6. Because of the complexity of the case, the parties respectfully request the Court enlarge the page limit for briefs in support of motions for summary judgment and responses to 40 pages and the page limit for replies to 15 pages. Defendants reserve the right to request additional enlargement for their combined motion for summary judgment, memorandum in support, and response to Plaintiff's motion for summary judgment depending on the complexity of the issues raised in Plaintiff's motion.

7. Because of this schedule, the parties agree that Defendants do not need to file a separate response to Plaintiff's Complaint. Accordingly, the current deadline for Defendants' response to the Complaint, which is August 13, 2024, should be vacated.

Respectfully submitted this 7th day of August, 2024.

/s/ Elizabeth Tulis

Elizabeth Tulis
Rebecca Kopplin
Benjamin Takemoto
Hannah Solomon-Strauss
Pardis Gheibi
Trial Attorneys
U.S. DEPARTMENT OF JUSTICE
Civil Division, Federal Programs
Branch
1100 L Street NW
Washington, D.C. 20005
T:(202) 514-9237
F: (202) 616-8470
elizabeth.tulis@usdoj.gov

*Counsel for Defendants United
States Department of Education,
Miguel Cardona, Catherine E.
Lhamon, United States Department
of Justice, Merrick B. Garland, and
Kristen Clarke*

/s/ Mathew W. Hoffmann

Tyson C. Langhofer*
Virginia Bar No. 95204
Mathew W. Hoffmann*
Virginia Bar No. 100102
ALLIANCE DEFENDING FREEDOM
44180 Riverside Pkwy
Lansdowne, Virginia 20176
T: (571) 707-4655
tlanghofer@ADFlegal.org
mhoffmann@ADFlegal.org

Natalie D. Thompson**
Texas Bar No. 24088529
ALLIANCE DEFENDING FREEDOM
440 First Street NW, Suite 600
Washington, DC 20001
T: (202) 393-8690
nthompson@ADFlegal.org

Jonathan A. Scruggs*
Arizona Bar No. 030505
ALLIANCE DEFENDING FREEDOM
15100 N. 90th Street
Scottsdale, Arizona 85260
T: (480) 444-0020
jscruggs@ADFlegal.org

Tim Davis, TX Bar No. 24086142
Allison Allman, TX Bar No. 24094023
Trevor Paul, TX Bar No. 24133388
JACKSON WALKER LLP
777 Main Street, Suite 2100
Fort Worth, Texas 76102
T: (817) 334-7200
tdavis@jw.com
aallman@jw.com
tpaul@jw.com

Counsel for Plaintiff

**Admitted pro hac vice*

***Practice supervised by one or more
D.C. Bar members while D.C. Bar
application is pending.*